

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA, )  
*ex rel.* KARL JEFFERSON and DIANA )  
JEFFERSON; THE STATE OF ILLINOIS )  
*ex rel.* KARL JEFFERSON and DIANA )  
JEFFERSON, )

Plaintiffs, )

v. )

Case No.: 3:17-cv-01402-SMY

UNITED IRONWORKERS, INC.; KIM )  
RASNICK; BUMPY'S STEEL ERECTION,) )  
LLC; D&K WELDING SERVICES, INC.; )  
and DORRIE HARRIS, )

Defendants. )

**JOINT STIPULATION FOR DISMISSAL**

The United States, the State of Illinois, and the Relators, through their undersigned counsel, pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, hereby stipulate to the dismissal of this Civil Action as follows:

1. The United States and State of Illinois have filed a Notice of Election to Intervene for Purposes of Settlement, dated January 24, 2022 (the "Election Notice"). *See* Doc. 54.

2. The United States, State of Illinois, Relators, and defendants United Ironworkers, Inc. ("UI"), Kim Rasnick ("Rasnick"), D&K Welding Services, Inc. ("D&K"), and Dorrie Harris ("Harris") have reached settlement agreements (the "Settlement Agreements") that require the United States, the State of Illinois, and Relators to jointly file a dismissal of this Civil Action, pursuant to Rule 41(a)(1), in accordance with the terms of the Settlement Agreements upon the United States' receipt of the Initial Installment payments by defendants as provided in the Settlement Agreements.

3. The United States has received the Initial Installment payments due under the Settlement Agreements.

4. The claims in the above-captioned Civil Action shall be dismissed, subject to the terms and conditions set forth in the Settlement Agreements, including as follows:

a. The United States' and State of Illinois' claims against defendants UI, Rasnick, D&K, and Harris are dismissed with prejudice as to the Covered Conduct, as that term is defined in the Election Notice and Settlement Agreements;

b. All other claims or allegations asserted against any defendant on behalf of the United States and State of Illinois in the Civil Action are dismissed without prejudice as to the United States and State of Illinois;

c. Relators' claims in the Civil Action are dismissed in their entirety with prejudice;

d. Each party shall bear its own attorneys' fees and costs, except as expressly provided to the contrary in the Settlement Agreements; and

e. The Court shall retain jurisdiction over any disputes that may arise regarding compliance with the Settlement Agreements, including the terms and conditions involving payments over time to resolve the Covered Conduct.

Respectfully submitted,

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